

EXHIBIT 3

IN THE DISTRICT OF THE UNITED STATES OF AMERICA
FOR THE SOUTHERN DISTRICT OF ILLINOIS

IN RE DEPAKOTE:

E.R.G., a minor, by CHRISTINA RAQUEL, individually as parent and next friend of E.R.G.,

Plaintiff(s),) Case No. 15-cv-702-NJR-SCW
) Case No. 12-cv-55-NJR-SCW

vs.

ABBOTT LABORATORIES, INC.

Defendant(s) .

TRIAL DAY 9

(a.m. session)

BE IT REMEMBERED AND CERTIFIED that heretofore on **6/5/2017**,
the same being one of the regular judicial days in and for the
United States District Court for the Southern District of
Illinois, **Honorable Nancy J. Rosenstengel**, United States
District Judge, presiding, the following proceedings were
recorded by mechanical stenography; transcript produced by
computer.

REPORTED BY: Molly N. Clayton, RPR, FCRR, Official
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1 as you know, they were telling you the incidence was not
2 available, right?

3 **A.** That's correct.

4 **Q.** If Abbott was aware of that information and didn't tell
5 you, do you believe that as a physician, you were adequately
6 warned?

7 **A.** No.

8 **Q.** I want to talk to you, Doctor, about a couple other things.
9 You were visited by sales representatives from Abbott from time
10 to time, right?

11 **A.** They would come through El Hogar, yes.

12 **Q.** Sure. And would they leave literature, materials, printed
13 information?

14 **A.** Yes.

15 **Q.** Did they leave actual published studies from time to time?

16 **A.** Yeah.

17 **Q.** Okay. Those were about the benefits of the drug or ways to
18 prescribe it, right?

19 **A.** Yes.

20 **Q.** In your time at El Hogar or any time you saw an Abbott
21 sales representative, do you recall them leaving you
22 information not about the benefits, but about the increased
23 risk of birth defects with this drug?

24 **A.** No.

25 **Q.** And I'm talking about this 10 percent.

REPORTER'S CERTIFICATE

I, Molly N. Clayton, RPR, FCRR, Official Court Reporter
for the U.S. District Court, Southern District of Illinois, do
hereby certify that I reported with mechanical stenography the
proceedings contained in pages 1121 - 1259; and that the same
is a full, true, correct and complete transcript from the
record of proceedings in the above-entitled matter.

DATED this 5th day of June, 2017.

s/Molly Clayton, RPR, FCRR